

## REMARKS

Appended to this response is a form granting the undersigned an associate power of attorney, and that further directs all future correspondence be mailed to the undersigned at the address appearing below (i.e., the address for customer number 29683). It is respectfully requested that this information be entered into the record for this application.

In response to the objection to the claims, each of the claims identified by the Examiner has been amended. As these amendments are deemed to be merely cosmetic in nature, they were not made for a reason related to the patentability of these claims, and the full scope and range of equivalents for all of the affected claim elements should remain intact. Other amendments of a merely cosmetic nature were also made, such as deleting references to "steps of" in the method and apparatus claims.

Turning now to the rejection of claims 1-7, 9-19 and 21-23 under 35 U.S.C. 103(a) as being unpatentable over Yalcinalp (US 6,507,857 B1) in view of Boag et al. (US 6,589,291 B1), and claims 8 and 20 under 35 U.S.C. 103(a) as being unpatentable over Yalcinalp (US 6,507,857 B1) in view of Boag et al., and further in view of Thum et al. (US 6,616,700 B1), the following points are noted.

The Examiner correctly recognizes that Yalcinalp does not explicitly disclose performing an intermediate stage content transformation using a first stage data layout to generate an intermediate data layout. Thus, the Examiner's statement that Yalcinalp does perform a final stage content transformation "using said intermediate data layout" is not agreed with.

In fact, the technique of Yalcinalp appears to rely on the use of external calls that are embedded in a style sheet as is stated at, for example, col. 6, lines 13-26:

"The method then proceeds to generate a transform document using the style sheet **and an external call embedded in an external component in the style sheet** (step 305). The external call is to a named component instance and may

perform a function defined by the developer creating the external call. In other words, it is not required that the external call perform some function related to the transformed document or even a function related to the document processing. It may be preferable for the developer of the style sheet to insert into the external function parameters and information that may be application dependent. However, as stated above, the external call may also perform various other types of processing." (emphasis added)

When characterizing Boag et al. the Examiner states that in the instant specification the applicant "described the intermediate stage comprises a browser-type substage based on the type of browser and internationalization stage which is specific language used by the client". This overly simplistic characterization of the embodiments of this invention is respectfully disagreed with. What is stated instead at, for example, page 5, lines 17-25, is the following:

"In the preferred embodiment the intermediate stage comprises a browser-type sub-stage using a set of browser-type rules, an internationalization stage using a set of internationalization rules, a user profile stage using a set of user profile rules, and a optimization stage using optimization rules. It should be noted that the number of rules and the type of rules are dependent on the operator of the server. Furthermore, the additional set of rules may be added to the intermediate stage rules or set rules may be deleted from the preferred embodiment without departing from the invention."

In any event, the Examiner uses Boag et al. for purportedly teaching the selecting of style sheets based on variable factors, such as target device and browser, or the selected style sheets may create output in a language appropriate for the wireless connection and the target device. The Examiner continues by stating that since Boag et al. disclose a method "for dynamically determining the most appropriate location for applying style sheets on a client request depends on the capabilities of the client device, which is similar to processing a user request document to a transformed document and formatting the transformed document specific to the client specification of Yalcinalp" that it would have obvious to combine the teachings of Boag and Yalcinalp to include

"performing an intermediate stage content transforming using the first stage data layout to generate a intermediate data layout to provide a technique for increasing the applicability of style sheets when a style sheet tailored to a particular target

environment is not readily available."

The Examiner's rationale for rejecting the claims is disagreed with, and is respectfully traversed.

It is pointed out that neither Yalcinalp or Boag et al. make any suggestion of:

"performing an intermediate stage content transformation using said first stage data layout to generate an intermediate data layout; and  
performing a final stage content transformation using said intermediate data layout to generate a presentation format based on a device used by said client",

as is recited in claims 1 and 13.

As was noted above, Yalcinalp disclose generating "a transform document using the style sheet and an external call embedded in an external component in the style sheet". Boag et al. disclose, in Fig. 3 and at col. 9, line 46, to col. 10, line 41, the following technique:

"If the test at Block 305 has a negative result, then control transfers to Block 310; otherwise, processing continues at Block 325.

At Block 310, a style sheet tailored to the target environment is not available. **The style sheet which has been selected may therefore be a more general-purpose style sheet which is capable of performing some type of desired filtering of data.** For example, application of a content-reducing style sheet which maintains the original document type might be beneficial. As another example, transforms that manipulate data for presentation without reference to a particular presentation medium (such as "selecting out", or hiding, data matching specified patterns) may be beneficial. This approach enables the applicability of style sheets to be increased, taking advantage of the transformations coded therein whenever a benefit can be realized. Block 310 will apply the selected style sheets at the server. **The resulting document may then be forwarded to a general purpose transcoding engine, as shown at Block 315. This is an optional step where more general purpose transformations (such as converting from one markup language to another) may be applied, and uses techniques which do not form part of the present invention. As one example, a general purpose transcoder which converts HTML to WML may be used,** such as the Prism transcoder which is commercially available from Spyglass, Inc. As another example, a transcoding algorithm may be applied to perform 256-color to 16-color reduction for all image files being sent over wireless connections. As yet another example,

the novel techniques disclosed in U.S. Pat. No. 6,138,156, which is titled "Selecting and Applying Content-Reducing Filters Based on Dynamic Environmental Factors" and is assigned to the same assignee, may be used. This invention describes a technique whereby environmental factors can be used to dynamically filter the content being delivered from a server to a user's workstation. **The choice of an appropriate general purpose transcoder is preferably determined using characteristics of the target device and browser.** This information may be obtained, for example, by inspecting the UserAgent field of the HTTP request. (In addition, protocols are under development for querying a device to determine this type of information, and could be used for this purpose. One such approach is the "Composite Capability/Preference Profiles", or "CC/PP", under development by W3C.) If no general purpose transcoding algorithm is located which is suitable for this document, Block 315 may be skipped, or an exception may be generated.

**By invoking a general purpose transcoding engine,** the present invention may be used advantageously with a new device type for which no specific style sheets are yet available. Suppose the new device requires documents encoded in WML, and the style sheet selection process of Block 300 determined that (in the absence of a style sheet tailored to this device) the best choice was a content-reducing style sheet which produces HTML. **Block 315 may then invoke a transcoder capable of converting HTML to WML,** as described above. In this manner, the benefit of the general content-reducing filter is used, while still being able to generate content in a markup language which the device can process." (emphasis added)

There is thus clearly no suggestion in Boag et al. of:

"performing an intermediate stage content transformation using said first stage data layout to generate an intermediate data layout; and  
performing a final stage content transformation using said intermediate data layout to generate a presentation format based on a device used by said client",

as is recited in claims 1 and 13. **In fact, the invocation of a particular transcoder (e.g., a HTML to WML transcoder) to operate on the selected style sheet appears to instead be a function that one could implement by using the embedded external calls of Yalcinalp** (see, for example, Yalcinalp at col. 6, lines 13-26, and col. 9, lines 31-38).

That is, if one did attempt to combine the teachings of Yalcinalp and Boag et al. in the manner

attempted by the Examiner, which is not admitted is suggested or technically feasible, the resulting hybrid system would appear at most to simply use the embedded external call of Yalcinalp to invoke the transcoder of Boag et al. What would clearly **not be suggested** to one of ordinary skill in the art would be performing an intermediate stage content transformation, using a first stage data layout to generate an intermediate data layout; and performing a final stage content transformation using the intermediate data layout to generate a presentation format based on a device used by a client.

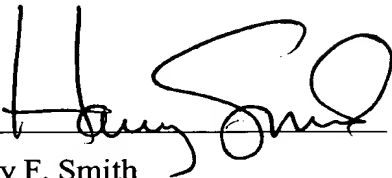
This being the case, independent claims 1 and 13 are both clearly patentable over the proposed combination of Yalcinalp and Boag et al., and thus all claims that depend from these independent claims are also patentable. This particularly pertains to all of those dependent claims that are directed specifically to the operation of the intermediate stage transformation, and the final stage transformation based on the result of the intermediate stage transformation.

The addition of the markup language presentation system of Thum et al. does not cure the deficiencies in the teachings of Yalcinalp and Boag et al.

The Examiner is respectfully requested to reconsider and remove the rejections of the claims under 35 U.S.C. 103(a), and to allow all of the pending claims 1-23 as now presented for examination. An early notification of the allowability of claims 1-23 is earnestly solicited.

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Respectfully submitted:

  
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